

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:)	
)	Case No. 08-35653 (KRH)
CIRCUIT CITY STORES, INC., et al)	Chapter 11
)	
Debtors)	Jointly Administered
)	

**JOINDER OF COKEM INTERNATIONAL, INC. TO OBJECTIONS OF LG
ELECTRONICS USA, INC. AND PARAMOUNT HOME ENTERTAINMENT INC. TO
CONFIRMATION OF DEBTORS' CHAPTER 11 PLAN OF LIQUIDATION**

Cokem International, Inc. ("Cokem"), a creditor and holder of an administrative expense claim in the cases of the above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby joins in the *Objection of LG Electronics USA, Inc. to Confirmation of Chapter 11 Plan of Liquidation* [Docket No. 5652] and *Objection of Paramount Home Entertainment Inc. to First Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors in Possession and its Official Committee of Creditors Holding General Unsecured Claims* [Docket No. 5667] (collectively, the "Objections"), and respectfully states as follows:

BACKGROUND

1. On November 10, 2008, Circuit City Stores, Inc. and its affiliated debtors (the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").

2. During the 20 days before the Debtors filed this case, the Debtors received goods worth \$414,129.44 from Cokem.

3. The Debtors did not pay for those goods, nor did they return the goods to Cokem. Accordingly, Cokem timely filed an administrative-expense request in accordance with Section 503(b)(9) of the Bankruptcy Code in the amount of \$414,129.44.

4. The Debtors have filed an Amended Joint Plan of Liquidation [Docket No. 5124] and Disclosure Statement [Docket No. 5030], pursuant to which the Debtors state, among other things, that they may not be able to pay all administrative and priority claims in full.

5. On October 13, 2009, the Debtors filed an objection seeking to temporarily disallow a portion of Cokem's administrative claim on the basis that the creditors were recipients of allegedly avoidable preferential transfers.

REQUEST FOR RELIEF AND JOINDER

Cokem hereby joins in the Objections for the reasons stated therein, and incorporates the Objections as though fully set forth herein.

CONCLUSION

Cokem respectfully requests that this Court enter an order denying confirmation of the Debtors Plan.

Dated: November 16, 2009

Respectfully submitted,

/s/ Alan M. Noskow

Alan M. Noskow (VSB # 51094)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Joinder of Cokem International, Inc. to Objections of LG Electronics USA, Inc. and Paramount Home Entertainment Inc. to confirmation of Debtors' Chapter 11 Plan of Liquidation was served this 16th day of November, 2009, via e-mail or ECF, as appropriate, and electronic mail on the counsel for the Debtors as follows:

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/s/Alan M. Noskow
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